

IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

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In Re: BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

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CASE NO: 2:15-MD-02641-DGC  
MDL No. 2641

This Document Relates to:  
2:16-cv-04111-DGC  
Shashawna Jones vs. Bard, et al.

**UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT**

Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure, moves this Court for an order amending the Complaint.

1. Plaintiff seeks leave to file the attached short form complaint to correct Paragraph 1 to read “Shashawna Jones Benitez” instead of “Shashawna Jones,” correct Paragraph 2 to read “Edwin Benitez” instead of “N/A,” and Paragraph 12 to read “X Count XV: Loss of Consortium” instead of “□ Count XV: Loss of Consortium” (see Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial).

2. Plaintiff’s counsel has conferred with Defendants’ counsel and Defendants do not oppose the filing of this motion.

Based on the foregoing, Shashawna Jones requests that this Court grant this request to correct Paragraph 1 to “Shashawna Jones Benitez,” correct Paragraph 2 to “Edwin Benitez,” and correct Paragraph 12 to read “X Count XV: Loss of Consortium” and for leave to file the Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial, and direct the Clerk to file the attached Amended Second Amended Master Short Form Complaint.

Dated: January 25, 2017

/s/ Joseph R. Johnson  
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**Attorneys for Plaintiff**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of January, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson